

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

DONALD EDWARDS	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 06 cv 3110
	)	
VILLAGE OF MELROSE PARK	)	Judge Coar
et al.	)	
	)	
Defendants	)	

**MOTION FOR EXTENSION OF TIME**

NOW COME the defendants, STEVE ROGOWSKI, PHIL NEGRON AND LESLIE SHANKLE, by and through their attorneys, LITCHFIELD CAVO, LLP., and move this Honorable Court for an extension of time within which to comply with Local Rule 54.3 as well as additional time to review plaintiff's Rule 54.3 submission. In support thereof, the defendants state as follows:

1. On March 28, 2008, the undersigned resigned his position with Dowd & Dowd, Ltd.
2. On April 1, 2008, the undersigned began working at Litchfield Cavo, LLP.
3. The *Edwards* matter was transferred over to Litchfield Cavo on April 6, 2008.
4. On April 3, 2008, plaintiff's counsel served a Local Rule 54.3 submission on Dowd & Dowd, Ltd. The April 3<sup>rd</sup> submission was not included in the file materials forwarded to Litchfield Cavo.

5. On April 18, 2008, the undersigned spoke with Brendan Schiller and learned that a Rule 54.3 submission had been forwarded to Dowd & Dowd, Ltd. Mr. Schiller offered to forward the materials to the undersigned new law firm (See Exhibit "A" attached hereto).

6. Inasmuch as lead defense counsel did not receive the Rule 54.3 submission until April 21, 2008, defendants request an additional fourteen days or until May 9, 2008 to comply with Local Rule 54.3(5).

7. The undersigned has discussed this request with Standish Willis, lead counsel for the plaintiff, and he indicated that he has no objection to this extension.

WHEREFORE, the defendants, STEVE ROGOWSKI, PHIL NEGRON AND LESLIE SHANKLE, pray that they be granted until May 9, 2008 to comply with Local Rule 54.3(5).

LITCHFIELD CAVO, LLP.

By: /s/ Patrick J. Ruberry  
Attorneys for the defendants  
STEVE ROGOWSKI, PHIL NEGRON  
and LESLIE SHANKLE

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**CERTIFICATE OF SERVICE**

I, the undersigned, being first duly sworn upon oath, depose, and say that I caused to be served Defendants' Motion for Extension of Time by electronically filing the same with the Clerk for the U.S. District Court for the Northern District of Illinois, Eastern Division, a copy of which was then forwarded to each attorney of record on the 22<sup>nd</sup> day of April, 2008.

/s/ Patrick J. Ruberry

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